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APPLICANT(s): W. Schmutz et al.

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EXAMINER: J. Keehan

TITLE: DEVICE FOR LOADING SUBSTRATES INTO AND
UNLOADING THEM FROM A CLEAN ROOM

ATTORNEY

DOCKET NO.: 390-010778-US (PCT)

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REPLY BRIEF

Sir:

This is in response to the Examiner's Answer mailed November 1, 2004 in the above identified application.

In regards to the first paragraph of Section 11, on page 4 of the Examiner's Answer, it should be noted that, Bonora discloses that the adaptor plate 27, when provided as part of the load port 24, allows a load port, that may have been initially configured for mating to one processing tool interface configuration, to be adapted for mating with a different BOLTS interface configuration of another processing tool. Nothing in Bonora says that an adaptor plate that is part of a given load port may be used for adapting other load ports to a processing tool interface.

Indeed, in col. 6, lines 36-40, Bonora discloses that it is the embodiment when the adaptor plate 27 is part of the BOLTS interface of the processing tool (and not part of the load port), that the adaptor plate may be generically designed so as to work with load ports of various configurations. Nothing whatsoever is said regarding that, when part of the load port itself, the adaptor plate may be used with more than one load port. Thus, in Bonora, it is possible that the adaptor plate when part of the load port is dedicated to that load port, and hence, may be permanently/non-removably attached to the load port and vice versa.

With respect to the argument on page 5 of the Examiner's Answer, the Examiner appears to agree that Bonora says nothing whatsoever that in the case where the adaptor plate is part of the BOLTS interface on the tool, the adaptor plate is adjustably oriented relative to the tool. Moreover, there is nothing in Bonora that says (expressly or inherently), that when the adaptor plate is part of the BOLTS interface, the adaptor plate can not be fixed/non-adjustably oriented relative to the BOLTS interface/processing tool (i.e. nothing that says that the adaptor plate 27 when part of the BOLTS interface must necessarily be adjustably mounted relative to the BOLTS interface/processing tool). It is not sufficient for anticipation of a given feature, that the disclosure in the prior art reference merely allow for the possibility that the otherwise undisclosed feature exists. The standard for anticipation under 35 U.S.C. 102 is that, the reference must expressly or inherently (i.e. the feature must necessarily exist) disclose the claimed feature. That is not the case here. The Examiner agrees, that Bonora does not expressly disclose that when part of the BOLTS

interface, the adaptor plate is adjustably oriented relative to the processing tool, and clearly, it is not necessary from what is expressly disclosed and shown in Bonora, that the adaptor plate 27, when part of the BOLTS interface be adjustably oriented relative to the processing tool. The Applicant has demonstrated in the Appeal Brief that according to the disclosure in Bonora, the adaptor plate, when part of the BOLTS interface of the processing tool, may indeed be fixed/non-adjustable relative to the processing tool. The features recited in claim 22 of the subject application are not disclosed in the cited prior art. Therefore, claim 22 is patentable and should be allowed. For all the foregoing reasons, the Board is requested to reverse the Examiner's rejection of claim 22.

The Commissioner is hereby authorized to charge payment for any fees associated with this communication or credit any over payment to Deposit Account No. 16-1350.

Respectfully submitted,



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12/30/04

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